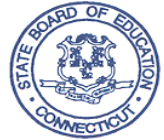




STATE OF CONNECTICUT  
DEPARTMENT OF EDUCATION



**TO:** Sponsors of School Child Nutrition Programs

**FROM:** John Frassinelli, Chief  
Bureau of Health/Nutrition, Family Services and Adult Education

**DATE:** October 16, 2014

**SUBJECT: Operational Memorandum #35-14 REVISED**  
Flexibility for Whole Grain-Rich Pasta in School Years 2014-15 and 2015-16

The Connecticut State Department of Education's (CSDE) Operational Memorandum 35-14, issued on June 9, 2014, addressed the U.S. Department of Agriculture's (USDA) flexibility for whole grain-rich pasta in school years 2014-15 and 2015-16. This revised memorandum provides updated information from the USDA that includes Questions and Answers (Q&As) as an attachment. The Q&As provide additional guidance to state agencies and school food authorities (SFAs) regarding whole grain-rich pasta flexibilities for school years 2014-15 and 2015-16.

### **Whole Grain-Rich (WGR) Requirements**

Beginning July 1, 2014, federal regulations require that all grains offered in the National School Lunch Program (NSLP) and School Breakfast Program (SBP) must be whole grain-rich. Foods that meet the whole grain-rich requirements for the school meal programs must comply with three criteria:

- contain at least 50 percent whole-grain meal and/or flour;
- any remaining grains must be enriched; and
- if the product contains any noncreditable grains such as bran or germ, they must be present at levels less than two percent ( $\frac{1}{4}$  ounce equivalent) of the product formula.

Foods that are 100 percent whole grain meet the WGR criteria; however, foods are not required to be 100 percent whole grain. Foods containing between 50 and 100 percent whole grains are allowable. For additional information on the WGR requirements, including how to evaluate if a grain product meets the whole grain-rich criteria, see the CSDE's handout, [\*Criteria for Whole Grain-rich Foods\*](#), and the USDA's [\*Whole Grain Resource for the National School Lunch and Breakfast Programs: A Guide to Meeting the Whole Grain-Rich Criteria\*](#).

### **Availability and Acceptability of Whole Grain-Rich Pasta**

The USDA updated meal standards meet the requirement of the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) to reflect the Dietary Guidelines for Americans, and are designed to ensure that school children receive nutritious meals while retaining flexibility for SFAs to offer meals that are appealing to children.

Pasta is a commonly served menu item that is popular with students. As such, it is particularly important that the updated standards maintain acceptability with students. Many types of whole grain-rich pasta, including those available through USDA Foods, are 100 percent whole grain. However, program operators have indicated, and our consultation with the pasta industry supports, that some of the available products degrade easily (e.g. lasagna and elbow noodles) during preparation and storage and consequently are not accepted by students.

Whole grain-rich pastas made from blends of whole grain and enriched flours may maintain better consistency and be more acceptable to students, but these products are still emerging in the marketplace. Therefore, the USDA recognizes that USDA Foods and industry may need additional time to develop a more expansive range of whole grain-rich pastas that are widely accepted by students.

### **Flexibility to Use Enriched Pasta during School Years 2014-15 and 2015-16**

The USDA appreciates that the progression to all whole grain-rich grains in school meals represents a significant transition for industry, program operators and students. The USDA understands that during school years 2014-15 and 2015-16, some SFAs may continue to struggle to secure a variety of whole grain-rich pasta products to incorporate into preferred menu items customarily served in previous school years. Therefore, the USDA is prepared to offer continued flexibility in this area for those SFAs that:

- removed previously popular pasta menu items that, when produced with whole grain-rich pasta, did not hold well or were not accepted by students (meaning students no longer consumed or selected the popular item); and
- demonstrate hardship in obtaining acceptable whole grain-rich pasta for that menu item.

Accordingly, if acceptable products for previously offered items are not available or accepted by students, the state agency may approve the SFA's request to continue to serve enriched pasta during school years 2014-15 and 2015-16, if needed. However, this flexibility is available only until acceptable products are available and identified and only while the SFA can demonstrate a continued negative impact.

In reviewing the SFA's request, the Connecticut State Department of Education (CSDE) will consider several factors. An SFA must provide evidence that they attempted to use the product in a previously popular menu item and that the SFA experienced significant challenges in achieving positive results. For example, an approvable request may state that the use of the new whole grain-rich pasta or the degradation of the new whole grain-rich pasta during the typical holding time negatively impacted the taste and texture of the product, and that the SFA received increased negative student or parent feedback as a result of this change. Based upon this information, the CSDE will also work with the SFA to identify the challenge and provide technical assistance as needed. This explanation is particularly helpful as it will enable the USDA to better identify any specific trends or patterns and tailor technical assistance or targeted solutions to mitigate challenges.

The USDA anticipates that state agencies and SFAs will actively collaborate to identify, evaluate and incorporate acceptable whole grain-rich pasta products into school menus. While working with state agencies, SFAs that have been approved to offer non-whole grain-rich pastas should

be considered compliant with the whole grain-rich requirements during an administrative review or a performance-based certification review.

The USDA's *Whole Grain Resource for the National School Lunch and Breakfast Programs* provides information to help program operators identify foods that meet the whole grain-rich criteria and offers suggestions for incorporating whole grain-rich foods into school menus. For a current list of available whole grain-rich pasta products, SFAs may search [USDA Foods](#), the [Child Nutrition \(CN\) Labeling authorized list](#) and the [Alliance for a Healthier Generation](#) Web site.

SFAs that would like to offer enriched pasta must mail or e-mail a written waiver request to their assigned school nutrition consultant. The request must:

- provide evidence that the SFA attempted to use the product in a previously popular menu item; and
- identify what significant challenges the SFA experienced in achieving positive results, such as the pasta menu item did not hold well, was not accepted by students or complaints were received from students or parents.

The SFA will be notified by their school nutrition consultant regarding the status of their request.

Questions may be directed to:

COUNTY ASSIGNMENTS	CONSULTANT	E-MAIL AND PHONE
Fairfield County	Fionnuala Brown	<a href="mailto:fionnuala.brown@ct.gov">fionnuala.brown@ct.gov</a> 860-807-2129
Hartford County (towns/cities beginning with A-R)	Teri Dandeneau	<a href="mailto:teri.dandeneau@ct.gov">teri.dandeneau@ct.gov</a> 860-807-2079
Hartford County (towns/cities beginning with S-W) Windham County	Susan Alston	<a href="mailto:susan.alston@ct.gov">susan.alston@ct.gov</a> 860-807-2081
Litchfield County	Allison Calhoun-White	<a href="mailto:allison.calhoun-white@ct.gov">allison.calhoun-white@ct.gov</a> 860-807-2008
Middlesex County Tolland County	Andy Paul	<a href="mailto:andrew.paul@ct.gov">andrew.paul@ct.gov</a> 860-807-2048
New Haven County	Jackie Schipke	<a href="mailto:jackie.schipke@ct.gov">jackie.schipke@ct.gov</a> 860-807-2123
New London County	Monica Pacheco	<a href="mailto:monica.pacheco@ct.gov">monica.pacheco@ct.gov</a> 860-807-2073

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Attachment

This is a numbered Operational Memorandum that contains important program information. Please read carefully and retain in a binder for future reference. Operational Memoranda are posted on the Connecticut State Department of Education's Child Nutrition Web site at <http://www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=320676>.